

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Sections 716 and 717 of)	CG Docket No. 10-213
the Communications Act of 1934, as Enacted)	
by the Twenty-First Century Communications)	
and Video Accessibility Act of 2010)	

COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

Competitive Carriers Association (“CCA”) submits these comments in response to the Public Notice issued by the Consumer and Governmental Affairs Bureau (“Bureau”) of the Federal Communications Commission (“FCC” or “Commission”), seeking input to assist the Commission in preparing its *2016 Biennial Report* to Congress on the Twenty-First Century Communications and Video Accessibility Act of 2010 (“CVAA”).¹

CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members consisting of small businesses, vendors, and suppliers that serve wireless carriers of all sizes. CCA’s members support the Commission’s goal of ensuring that wireless technologies are accessible to individuals with communications disabilities, while encouraging further investment and innovation for all consumers.

¹ *Consumer and Governmental Affairs Bureau Seeks Comment on the Accessibility of Communications Technologies for the 2016 Biennial Report Required by the Twenty-First Century Communications and Video Accessibility Act*, Public Notice, CG Docket No. 10-213, DA 16-961 (rel. Aug. 23, 2016) (“Public Notice”).

I. INTRODUCTION.

CCA and its members have long been committed to providing communications services to people with disabilities. CCA's members continuously work to train personnel and provide information about covered products and services to facilitate better accessibility for consumers. In addition, competitive carriers support the adoption of new technologies and the migration from legacy to IP-based services, both of which are important for accessibility. While design and implementation of new services and products may result in "growing pains," CCA emphasizes that new technologies have enormous potential to improve accessibility for individuals with disabilities. CCA urges the FCC to help wireless carriers make continued progress toward improved accessibility by continuing to encourage and facilitate the transition to new technologies, and fostering opportunities to make more spectrum available. To advance these goals, CCA offers the following comments and recommendations in response to the Commission's tentative findings for its upcoming report to Congress.

II. COMMENTS AND TENTATIVE FINDINGS ON ACCESSIBILITY.

Competitive carriers have made significant technological advancements since the FCC's *2014 Biennial Report* to Congress. Nevertheless, the Commission tentatively concludes in the Public Notice that there has been "little, if any progress" made with respect to the number of non-smartphone devices used for telecommunications and advanced communications services that are accessible to individuals who are blind or visually impaired since the last report.² CCA and its members are hopeful that continued collaboration between industry and consumers will address and ameliorate the FCC's tentative conclusion through greater advancements in accessible technologies for persons with disabilities.

² Public Notice, at Attachment 1 ¶¶ 19-20.

CCA also applauds and echoes the Commission's conclusion that significant progress has been made in accessibility for people with communications disabilities, especially with the Commission's proposed rules to facilitate the transition from text telephone ("TTY") technology to real-time text ("RTT") communication,³ and its proposal to adopt the joint consensus recommendation on hearing aid compatible ("HAC") devices. CCA's members are strongly committed to developing and implementing innovative technologies, like RTT, and to working with other stakeholders to make more HAC devices available, to better serve consumers with disabilities.

The Commission's RTT proceeding also represents an important step forward for improved accessibility. All stakeholders agree that TTY technology presents serious challenges as more users migrate to IP-based services.⁴ RTT, in contrast, is designed to work on IP networks and take advantage of the greatly expanded capabilities of those networks.⁵ The widespread adoption of RTT technology will enable more consumers that are hard of hearing to fully use and benefit from telecommunications and advanced communications services.

Similarly, CCA stands with other commenters in favor of the Commission's rulemaking proceeding on the joint consensus proposal for HAC devices.⁶ The Commission's goal toward a 100 percent mobile phone HAC requirement, if it's determined to be achievable, is an important step in making telecommunications and advanced communications services even more widely

³ See *Transition From TTY to Real-Time Text Technology; Petition For Rulemaking To Update The Commission's Rules For Access To Support The Transition From TTY To Real-Time Text Technology, And Petition For Waiver Of Rules Requiring Support of TTY Technology*, Notice of Proposed Rulemaking, 31 FCC Rcd. 6247 (2016) ("RTT NPRM").

⁴ *Id.* ¶ 11.

⁵ *Petition of Competitive Carriers Association for Declaratory Ruling or, In the Alternative, for a Waiver* at 14, GN Docket No. 15-178 (filed Nov. 3, 2015).

⁶ See Public Notice, at Attachment 1 ¶¶ 14-15.

available to consumers. CCA encourages the Commission to include the joint consensus proposal for HAC devices in its upcoming report to Congress, as evidence of ongoing collaboration between industry and consumer stakeholders and progress towards improving communications for all.

III. INFORMATION REPORTING, DOCUMENTATION AND TRAINING.

CCA's members continue to make information reporting, documentation, and training a priority, and understand that providing information about covered products and services, coupled with appropriately trained personnel, are critical aspects of ensuring true accessibility. As a result of these continued efforts, the Commission notes that industry overall has made "notable efforts" in ensuring availability of information and documentation.⁷ CCA agrees with the Commission's finding, as its members strive to ensure information is bountiful and personnel are adequately informed. CCA's members also remain committed to maintaining up-to-date information on websites and in print materials, as reflected in the record.⁸

Similarly, CCA strives to aid its members in fostering an exchange of information between industry stakeholders and consumers. For example, CCA regularly hosts roundtable discussions to foster candid conversations between its members and a variety of stakeholders on ways to improve access to telecommunications services and advanced telecommunications capabilities, while helping its members maintain compliance with CVAA requirements. Most recently, CCA hosted a CVAA Roundtable on June 29, 2016, to discuss the FCC's RTT Notice of Proposed Rulemaking and advancements on hearing aid compatibility efforts. CCA therefore

⁷ *Id.* ¶ 27.

⁸ *See* Comments of American Council for the Blind, CG Docket No. 10-213 at 2-3 (filed June 29, 2016) ("ACB Comments"); PN Comments of CTIA – Accessibility of Communications Technologies, CG Docket No. 10-213 at 31-33 (filed June 22, 2016) ("CTIA Comments").

encourages the Commission to include these “notable efforts” in its report to Congress, as competitive carriers continuously endeavor to deliver comprehensive information to consumers on all products and services.

IV. ACCESSIBILITY BARRIERS IN NEW TECHNOLOGIES.

The Commission tentatively concludes that accessibility barriers still exist with respect to certain new communications technologies, particularly with web and video conferencing services.⁹ While new technologies may have some accessibility challenges, CCA also believes these new technologies present enormous opportunities and have a net-positive effect on accessibility, by providing individuals with disabilities with more varied ways of communicating. For example, as discussed above, RTT technology promises to be tremendously beneficial to hearing-impaired consumers, especially over new IP-based mediums. Other advancements, like text-to-911 and HD Voice offerings, will similarly improve communications services for those with hearing loss.

With the advent of exciting new technologies on the horizon, it is critical that the wireless industry have the resources it needs to innovate and better serve the accessibility community. CCA agrees with CTIA’s observation that one of the most important things the Commission can do to encourage the deployment of more accessible services and devices is to make additional licensed and unlicensed spectrum available to the wireless industry.¹⁰ New technologies, like LTE-U, 5G and the Internet of Things (“IoT”), will deliver faster speeds and higher capacity for the wireless services used by individuals with disabilities. However, next generation technologies will require more spectrum to support the mesh networks and densification needed

⁹ Public Notice ¶ 38.

¹⁰ CTIA Comments at 38-39.

to deploy 5G and IoT services. By exploring pathways to new spectrum resources, the FCC will permit the wireless industry, including CCA's members, to support growing wireless demand among the accessibility community and more quickly deploy advanced technologies.

V. CONCLUSION.

CCA's members are committed to ensuring full accessibility of wireless communications for all consumers. CCA therefore applauds the Commission's efforts to expand access to communications for all consumers which have led to significant technological advancements. As the FCC prepares its report to Congress, CCA encourages the Commission to acknowledge those improvements, while continuing to promote new and innovative technologies that promise to enable even better access to telecommunications and advanced communications services.

Respectfully submitted,

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